

Section 1. Registration Information

Source Identification

Facility Name: Goal Line LP
Parent Company #1 Name:
Parent Company #2 Name:

Submission and Acceptance

Submission Type: Re-submission
Subsequent RMP Submission Reason: 5-year update (40 CFR 68.190(b)(1))
Description:
Receipt Date: 23-May-2014
Postmark Date: 23-May-2014
Next Due Date: 23-May-2019
Completeness Check Date: 23-May-2014
Complete RMP: Yes
De-Registration / Closed Reason:
De-Registration / Closed Reason Other Text:
De-Registered / Closed Date:
De-Registered / Closed Effective Date:
Certification Received: Yes

Facility Identification

EPA Facility Identifier: 1000 0012 2173
Other EPA Systems Facility ID: Cal000122995

Dun and Bradstreet Numbers (DUNS)

Facility DUNS: 861499762
Parent Company #1 DUNS:
Parent Company #2 DUNS:

Facility Location Address

Street 1: 555 N. Tulip St
Street 2:
City: Escondido
State: CALIFORNIA
ZIP: 92025
ZIP4: 2532
County: SAN DIEGO

Facility Latitude and Longitude

Latitude (decimal): 33.118552
Longitude (decimal): -117.099367
Lat/Long Method: GPS - Unspecified
Lat/Long Description: Process Unit
Horizontal Accuracy Measure: 25
Horizontal Reference Datum Name: North American Datum of 1983
Source Map Scale Number:

Owner or Operator

Operator Name:	PurEnergy, LLC
Operator Phone:	(315) 448-2266

Mailing Address

Operator Street 1:	4488 Onondaga Blvd.
Operator Street 2:	
Operator City:	Syracuse
Operator State:	NEW YORK
Operator ZIP:	13219
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Robert Mason
RMP Title of Person or Position:	Facility Manager
RMP E-mail Address:	bob.mason@goallinelp.org

Emergency Contact

Emergency Contact Name:	Robert Mason
Emergency Contact Title:	Facility Manager
Emergency Contact Phone:	(760) 738-4999
Emergency Contact 24-Hour Phone:	(619) 341-0419
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	bob.mason@goallinelp.org

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Region VI LEPC
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Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	9
FTE Claimed as CBI:	

Covered By

OSHA PSM :	
EPCRA 302 :	Yes
CAA Title V:	
Air Operating Permit ID:	

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	02-Aug-2011
Last Safety Inspection Performed By an External Agency:	State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	Risk Management Professionals, Inc
Preparer Phone:	(949) 282-1023
Preparer Street 1:	300 Goddard
Preparer Street 2:	Suite 200
Preparer City:	Irvine
Preparer State:	CALIFORNIA
Preparer ZIP:	92617
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.
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Process Chemicals

Process ID:	1000050955
Description:	SCR Ammonia System
Process Chemical ID:	1000061769
Program Level:	Program Level 2 process
Chemical Name:	Ammonia (conc 20% or greater)
CAS Number:	7664-41-7
Quantity (lbs):	41400
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000050955
Process NAICS ID:	1000051512
Program Level:	Program Level 2 process
NAICS Code:	221118
NAICS Description:	Other Electric Power Generation

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000041628

Percent Weight:	30.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000044137

Percent Weight:	30.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Active Mitigation Considered

Sprinkler System:
Deluge System:
Water Curtain:
Neutralization:
Excess Flow Valve:
Flares:
Scrubbers:
Emergency Shutdown: Yes
Other Type:

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

No records found.

Section 8. Program Level 2

Description:

No description available.

Program Level 2 Prevention Program Chemicals

Prevention Program Chemical ID:	1000034220
Chemical Name:	Ammonia (conc 20% or greater)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7

Process ID:	1000050955
Description:	SCR Ammonia System
Prevention Program Level 2 ID:	1000033619
NAICS Code:	221118

Safety Information

Safety Review Date (The date of the most recent review or revision of the safety information):	23-Sep-2013
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Safety Compliance Regulations or Design Codes/Standards

NFPA 58 (or state law based on NFPA 58):	
OSHA (29 CFR 1910.111):	
ASTM Standards:	Yes
ANSI Standards:	Yes
ASME Standards:	Yes
None:	
Other Regulation, Design Code, or Standard:	
Comments:	

Hazard Review

Hazard Review Date (The date of completion of most recent review or update):	28-Apr-2014
Change Completion Date (The expected or actual date of completion of all changes resulting from the hazard review):	28-Apr-2015

Major Hazards Identified

Toxic Release:	Yes
Fire:	
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes

Loss of Cooling, Heating, Electricity, Instrument Air:

Earthquake:

Floods (Flood Plain):

Tornado:

Hurricanes:

Other Major Hazard Identified:

Process Controls in Use

Vents:

Relief Valves: Yes

Check Valves: Yes

Scrubbers:

Flares:

Manual Shutoffs: Yes

Automatic Shutoffs: Yes

Interlocks:

Alarms and Procedures: Yes

Keyed Bypass:

Emergency Air Supply:

Emergency Power:

Backup Pump:

Grounding Equipment:

Inhibitor Addition:

Rupture Disks:

Excess Flow Device:

Quench System:

Purge System:

None:

Other Process Control in Use:

Mitigation Systems in Use

Sprinkler System:

Dikes: Yes

Fire Walls:

Blast Walls:

Deluge System:

Water Curtain:

Enclosure:

Neutralization:

None:

Other Mitigation System in Use:

Monitoring/Detection Systems in Use

Process Area Detectors: Yes

Perimeter Monitors:

None:

Other Monitoring/Detection System in Use:

Changes Since Last PHA or PHA Update

Reduction in Chemical Inventory:

Increase in Chemical Inventory:

Change Process Parameters:
Installation of Process Controls:
Installation of Process Detection Systems:
Installation of Perimeter Monitoring Systems:
Installation of Mitigation Systems:
None Recommended: Yes
None:
Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 23-Sep-2013

Training

Training Review Date (The date of the most recent review or revision of training programs): 03-Jun-2011

The Type of Training Provided

Classroom: Yes
On the Job:
Other Training:

The Type of Competency Testing Used

Written Tests: Yes
Oral Tests:
Demonstration:
Observation:
Other Type of Competency Testing Used:

Maintenance

Maintenance Review Date (The date of the most recent review or revision of maintenance procedures): 23-Sep-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test): 28-Mar-2014
Equipment Most Recently Inspected or Tested: UT testing for Pressure Vessel and regular preventive maintenance inspections are carried out for calibrations, leaks, and visual inspections.

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit): 22-Nov-2011
Audit Completion Date (The expected or actual date of completion of all changes resulting from the compliance audit): 22-Jun-2012

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Changes Date (Expected or actual date of completion of all changes resulting from the investigation):

Most Recent Change Date: (The date of the most recent change that triggered a review or revision of safety information):

Confidential Business Information

CBI Claimed:

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?):

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Healthcare (Does facility's ER plan include information on emergency health care?):

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Fire Department, HAZMAT Division

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (619) 338-2222

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120:

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: Yes

State EPCRA Rules or Laws: Yes

Other (Specify):

Executive Summary

EXECUTIVE SUMMARY

Accidental Release Prevention

Goal Line LP has developed a Risk Management Program and an Emergency Response Plan to address CalARP Program requirements (19 CCR §2735-2785).

Goal Line LP has a long standing commitment to worker and public safety. This commitment is demonstrated by the resources invested in accident prevention, such as personnel training and consideration of safety in the design, operation, and maintenance of the Ammonia Systems. Goal Line LP's policy is to implement reasonable controls to prevent foreseeable releases of regulated substances.

Stationary Source and Regulated Substance

The Goal Line LP is located at 555 Tulip Street, Escondido, California 92025.

The regulated substances at the Facility are: anhydrous ammonia for the Ammonia Absorption Refrigeration Unit and 30% aqueous ammonia for both the SCR Ammonia System and the Ammonia Absorption System.

Hazard Assessment Summary/Offsite Consequence Analysis

Process No.1: SCR Ammonia System - 30% Aqueous Ammonia

Worst-Case Release Scenario Results Summary:

Per CalARP Regulations and EPA RMP Regulations, one worst-case analysis has been defined and modeled for the SCR Ammonia System. The results can be found in the Hazard Assessment documentation located behind the Hazard Assessment tab of the 2014 Five Year Update Binder.

Alternative Release Scenario Results Summary:

An alternative release scenario was modeled. The results can be found in the Hazard Assessment documentation located behind the Hazard Assessment tab of the 2014 Five Year Update Binder.

Process No.2: Ammonia Absorption Refrigeration Unit - Anhydrous Ammonia. System is not regulate by the EPA only regulated by CalARP.

Worst-Case Release Scenario Results Summary:

Per CalARP Regulations, one worst-case analysis has been defined and modeled for the Ammonia Absorption Refrigeration Unit. The results can be found in the Hazard Assessment documentation located behind the Hazard Assessment tab of the 2014 Five Year Update Binder.

Alternative Release Scenario Results Summary:

An alternative release scenario was modeled. The results can be found in the Hazard Assessment documentation located behind the Hazard Assessment tab of the 2014 Five Year Update Binder.

Risk Considerations

Although the storage and use of ammonia has inherent potential risks, and worst-case release scenarios can potentially reach the community; Goal Line LP has recognized these potential risks and structured its safety programs to make the worst-case type of event non-credible. In addition to the safety practices of the company and plant personnel to make this worst-case event non-credible, it should also be recognized that there are inherent analysis assumptions that make the results of the atmospheric dispersion analysis appear worse than what would actually be expected during such an event (e.g., In the event of a release, sudden rupture and flashing of ammonia would be highly turbulent. Turbulence causes entrainment of air and the released vapor dilutes much more quickly than is shown in the model).

In addition to the use of conservative analysis assumptions that over-predict the effects of a potential release, other characteristics of the facility and site serve to minimize the potential risks associated with an ammonia release, including the following:

Although, the facility is not subject to Cal/OSHA PSM, the facility prevention program meets and exceeds the PSM requirements. Ammonia sensors are located in the process area. Automatic/Manual shutdowns in place. Personal Protective Equipment (PPE) is used by plant personnel, as necessary. The history of the Goal Line LP facility (i.e., no CalARP-applicable ammonia releases) reflects the adequacy of the design and diligence of the plant staff in safely operating the Ammonia Absorption Refrigeration Unit and SCR System.

Accidental Release Prevention Program

The facility has an inventory of 41,400 pounds (lbs.) aqueous ammonia on-site. Therefore, it is over the 20,000-lb. threshold (20% or greater concentration) for US EPA RMP and the 500-lb. (all concentrations) state threshold for CalARP Program. Goal Line LP is not subject to Cal/OSHA PSM or Program 3 requirements due to the fact that the concentration of aqueous ammonia managed at the facility is 30% and the Cal/OSHA PSM threshold quantities of aqueous ammonia is only for concentrations greater than 44%. For the reasons mentioned above, the SCR Ammonia System is subject to CalARP Program Level 2 and US EPA RMP Program Level 2.

The Absorption Refrigeration Unit has an inventory of 5,160 lbs. anhydrous ammonia on-site. The regulated substance is over the 500-lb. threshold for the CalARP Program but under the US EPA RMP and Cal/OSHA PSM Program threshold quantity of 10,000 lbs. Therefore, the Absorption Refrigeration Unit is only subject to CalARP Program Level 2.

As part of the implementation of this CalARP Program, even though the Ammonia Absorption Refrigeration Unit and the Ammonia SCR System are only subject to Prevention Program 2 requirements, Prevention Program 3 elements were implemented by Goal Line LP to manage process safety issues associated with the use of ammonia for the NOx abatement, as well as for the refrigeration system.

In addition, common industry standards, policies, and procedures are currently utilized to ensure safe practices are being performed.

The Prevention Program 3 elements include:

- Process Safety Information
- Process Hazard Analysis
- Operating Procedures
- Training
- Mechanical Integrity
- Management of Change
- Pre-Startup Safety Review
- Compliance Audits
- Incident Investigation
- Employee Participation
- Hot Work Permit
- Contractors

In addition, key emergency response elements were addressed in Section 4.7 of this document.

Five-Year Accident History

New accident history information - For any accidental release meeting the five-year accident history reporting criteria of 19 CCR §2750.9, the owner or operator shall submit the data required under 19 CCR §2745.5, §2745.6, and §2745.7 with respect to that accident within six months of the release or by the time the RMP is updated under 19 CCR §2745.10, whichever is earlier. From 19 CCR §2750.9:

The owner or operator shall include in the five-year accident history all accidental releases from covered processes that resulted in

deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage.

There have been no CalARP-applicable releases of ammonia at Goal Line LP in the past five years.

Emergency Response Program

Goal Line LP is not a First Responder Facility. The Facility has implemented an Emergency Action Plan (EAP) that meets the requirements of 8 CCR §3220 and does not assume the role of first responder during an emergency. Employees are trained to evacuate and call 9-1-1. The Goal Line LP will coordinate with local Fire Department and First Responders. They are trained and fully equipped to respond to hazardous material releases

Goal Line LP maintains the Business Emergency Plan (BEP) for the facility. The BEP provides the response protocols and notification procedures, evacuation routes, ammonia health hazards, and mitigation procedures, which have been implemented to respond effectively to emergency situations that may arise at the facility. The BEP is reviewed and updated at least once per year to ensure compliance with CalARP and BEP regulations.

Key elements of the BEP include:

Emergency Alarm Procedures
Evacuation Procedures
Safety and Health Considerations
Notification Procedure

External Events Analysis Information

Pursuant to the requirements of 19 CCR §2745.6(I); the following external events analysis information shall be submitted:

The types of natural and human caused external events considered in PHA 19 CCR §2760.2 or Hazard Review 19 CCR §2755.2.

oDuring the April 28, 2014 Process Hazard Analysis (PHA), plausible events were considered. General events external to the facility that can conceivably cause a release of ammonia were addressed. For detail information, refer to PHA Report located within the PHA Section Tab of the 2014 Five-Year Update Binder.

The estimated magnitude or scope of external events which were considered. If not known, the owner or operator of the stationary source shall work closely with the AA to determine what is required. If seismic events are applicable, the parameters used in the consideration of the seismic analysis and which edition of the Uniform Building Code was used when the process was designed.

oThe magnitudes of the external events considered are detailed within the PHA Worksheets and were qualitatively risk-ranked by the PHA Team.

For each external event, with a potential to create a release of a regulated substance that will reach an endpoint offsite, apply

- 1)The expected date of completion of any changes resulting from the Process Hazard Analysis (PHA)
- 2)Major hazards identified;
- 3)Process controls in use;
- 4)Mitigation systems in use;
- 5)Monitoring and detection systems in use; and,
- 6)Changes since the last PHA

oRefer to Section 7.4 section of the RMPe*submit, under PHA, for the required information.

The date of the most recent field verification that equipment is installed and maintained as designed.

oThe most recent field verification of equipment was conducted on June 2010 and it included the UT testing for both Anhydrous Ammonia and the Aqueous Ammonia systems.

oRegular preventive maintenance inspections are carried out for calibrations, leaks, and visual inspections. The Anhydrous system (AARU) had the absorbers and condenser opened, cleaned and inspected on 3/28/14. The Anhydrous cross exchangers were re-tubed 3/28/14.

Planned Changes To Improve Safety

The PHA study has been conducted to examine mitigation measures to improve safety at the facility. Planned changes to improve safety are listed as recommendations in the April 28, 2014 PHA Report located behind the PHA Tab of the 2014 Five-Year Update Binder.

Flammables: Worst Case

The use of flammable materials at Goal Line LP is not encompassed by either the federal or state RMP requirements. Therefore, this section is not applicable.

Flammables: Alternative Release

The use of flammable materials at Goal Line LP is not encompassed by either the federal or state RMP requirements. Therefore, this section is not applicable.